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CHIPOTLE MEXICAN GRILL, INC.

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA FRESNO DIVISION**

VIVIAN SALAZAR, an individual  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

CHIPOTLE MEXICAN GRILL, INC.  
a Delaware Corporation; and DOES 1  
through 10, inclusive,

Defendants.

CASE NO.: 2:21-CV-01805-KJM-DB

ASSIGNED TO THE HONORABLE  
JUDGE KIMBERLY J. MUELLER

**SECOND JOINT STIPULATION TO  
EXTEND TIME FOR DEFENDANT  
CHIPOTLE MEXICAN GRILL, INC.  
TO RESPOND TO INITIAL  
COMPLAINT BY MORE THAN 28  
DAYS AND ORDER**

Complaint served: September 30, 2021  
Current Deadline: November 25, 2021  
New Deadline: December 16, 2021

1 Pursuant to Local Rule 144, Plaintiff Vivian Salazar (“Plaintiff”) and  
2 Defendant Chipotle Mexican Grill, Inc. (“Defendant”) (collectively Plaintiff and  
3 Defendant are referred to as the “Parties”), by and through their respective counsel,  
4 stipulate to extend the time for Defendant to respond to Plaintiff’s complaint.  
5 The Parties stipulate as follows:

6 1. On September 30, 2021, Plaintiff filed her Complaint in this action  
7 alleging violations of the Americans with Disabilities Act of 1990 and the Unruh  
8 Civil Rights Act;

9 2. Defendant was served on October 7, 2021;

10 3. Defendant’s responsive pleading was originally due on October 28,  
11 2021;

12 4. On October 28, 2021, the Parties stipulated to extend Defendant’s time  
13 to respond to November 25, 2021 [Doc. 6];

14 5. Since then, the Parties have in good faith engaged in settlement  
15 discussions;

16 4. The Parties met and conferred and agreed to extend the deadline for  
17 Defendant to respond to the Complaint to December 16, 2021, to allow additional  
18 time to explore the potential for early resolution;

19 5. This request is the second request for an extension of time;

20 6. This change will not alter the date of any other event or deadline  
21 already fixed by this Court; and

22 7. This request is not for the purposes of delay.

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1 IT IS HEREBY STIPULATED by and between the Parties that Defendant  
2 has until December 16, 2021, to respond to Plaintiff's complaint.

3 **SO STIPULATED.**

4  
5 DATE: November 24, 2021

WILSHIRE LAW FIRM

6 By: /s/ Binyamin Manoucheri  
7 Thiago M. Coelho  
8 Binyamin I. Manoucheri  
Attorneys for Plaintiff  
VIVIAN SALAZAR

9  
10 DATE: November 23, 2021

MARTENSON, HASBROUCK &  
SIMON LLP

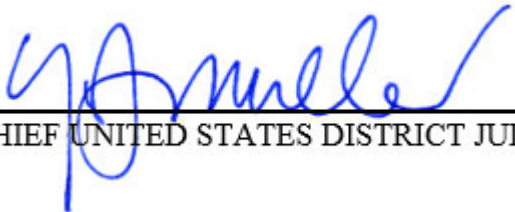
11  
12  
13 By: /s/ Michelle A. Patroni  
14 Elizabeth Bulat Turner  
Michelle A. Patroni  
Danielle J. Vukovich  
15 Attorneys for Defendant  
CHIPOTLE MEXICAN GRILL, INC.

**ORDER**

Having reviewed the Parties' stipulation, and good cause appearing, this Court grants the stipulation to extend the time for Defendant to respond to Plaintiff's Complaint to December 16, 2021.

**IT IS SO ORDERED.**

DATE: December 2, 2021.

  
CHIEF UNITED STATES DISTRICT JUDGE